

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

UNITED STATES OF AMERICA

*

v.

*

Criminal No.: GLR 21-444

MICHAEL MCDONALD

*

Defendant

*

* * * * *

MOTION FOR DISCLOSURE PURSUANT TO RULES 404(B) AND 609

The Defendant, Michael McDonald, by and through counsel, Julie M. Reamy, moves this Honorable Court to order that the Government disclose any evidence it intends to introduce against him regarding prior or subsequent criminal conduct and/or “bad acts” that are not charged or alleged to be part of any conspiracy charged in the Indictment herein, pursuant to Federal Rules of Evidence 404(b) and 609.

WHEREFORE, the Defendant respectfully requests that this Honorable Court grant this motion. The Defendant also requests any further relief that justice may require.

Respectfully submitted,

_____/s/____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of March 2022, a copy of the foregoing *Motion for Disclosure Pursuant to Rules 404(b) and 609* was filed electronically in the United States District Court for the District of Maryland, was served electronically through the Clerk of the United States District Court using CM/ECF, upon Assistant United States Attorney, Kathleen Gavin.

_____/s/_____
Julie M. Reamy